

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

SABRINA CORLEY,)	
)	
Plaintiff,)	
)	
VS.)	Case No.: 3:12-cv-1250
)	JURY DEMAND
WAL-MART STORES EAST, INC.,)	JUDGE SHARP
d/b/a WAL-MART, WAL-MART)	MAGISTRATE JUDGE KNOWLES
ASSOCIATES, INC., and)	
WAL-MART STORES, INC.,¹)	
)	
Defendants.)	

RULE 26(A) INITIAL DISCLOSURE OF DEFENDANTS

1. Fed. R. Civ. P. 26(a)(1)(A):

The following individuals are likely to have discoverable information that these defendants may use to support their claims or defenses unless solely for impeachment:

Katrina Smith
2421 Powell Ave
Nashville, TN 37204
(615) 383-3844

Katrina Smith was the assistant manager on duty that day. She was the first person to speak with plaintiff after the incident. She is now employed by a different Wal-Mart store.

Thomas Thompson
3035 Hamilton Church Road
Antioch, TN 37013
615-360-2228

¹ Wal-Mart Stores East, LP, is the entity that operated the store on the date of this accident. It was incorrectly sued as Wal-Mart Stores East, Inc., d/b/a Wal-Mart, Wal-Mart Associates, Inc., and Wal-Mart Stores, Inc. Defendants may be referred to as "Wal-Mart" in this document.

Thomas Thompson is a grocery associate who was working that day. You can see him in the video looking down the aisle where the plaintiff allegedly slipped at 3:38pm, approximately 2 minutes before the incident occurred.

Greg Tunstill
3035 Hamilton Church Road
Antioch, TN 37013
615-360-2228

Greg Tunstill is the store manager.

Brian Hicks
4424 Lebanon Pike
Hermitage, TN 37076
(615) 883-0201

Brian Hicks is the asset protection manager. He preserved the store surveillance video. He is now employed by a different Wal-Mart store.

Plaintiffs and the people identified in plaintiffs' disclosures and discovery responses may also have such information.

2. Fed. R. Civ. P. 26(a)(1)(B)

All documents, data compilations, and tangible things in defendants' possession, custody, or control that the defendants may use to support its claims or defenses, unless solely for impeachment, are as follows:

- (1) Wal-Mart's incident report
- (2) Customer statement
- (3) Katrina Smith's witness statement
- (4) Wal-Mart surveillance video of the incident
- (5) Screen shots of Wal-Mart surveillance video of the incident
- (6) Narrative of store surveillance video

(7) Recorded interview with plaintiff on 11/30/11

3. Fed. R. Civ. P. 26(a)(1)(C):

These defendants are not claiming damages.

4. Fed. R. Civ. P. 26(a)(1)(D):

To the extent applicable, any insurance agreement covered by this rule will be made available to plaintiffs' counsel at a mutually agreeable date, time, and location.

These defendants reserve the right to timely supplement these initial disclosures as necessary.

s/ G. Andrew Rowlett
G. Andrew Rowlett, No. 16277
Meredith Hiester, No. 30183
HOWELL & FISHER, PLLC
Court Square Building
300 James Robertson Parkway
Nashville, TN 37201-1107
(615) 244-3370
Attorneys for Defendants

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served by the electronic filing system upon:

Rocky McElhaney
Rocky McElhaney Law Firm, PC
1311 Sixth Avenue North
Nashville, TN 37208
Attorney for plaintiff

on this the 10th day of December, 2012.

s/ G. Andrew Rowlett

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